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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corporation, et al.*, Case No. 04-CV-7280 (S.D.N.Y.)

*Euro Brokers, Inc. v. Al Baraka Investment and Development Corporation, et al.*, Case No. 04-CV-7216 (S.D.N.Y.)

**STIPULATION AND ORDER REGARDING SCHEDULE TO  
RESPOND TO COMPLAINT CONSOLIDATED UNDER MDL 1570**

It is HEREBY STIPULATED AND AGREED, by and between Plaintiffs in the above-referenced cases consolidated under 03 MDL 1570 and Defendants Ahmed Totonji, Grove Corporate, Heritage Education Trust, Iqbal Unus, M. Omar Ashraf, M. Yaqub Mirza, Mohammed Jaghli, Muhammad Ashraf, Sterling Charitable Gift Fund, and Sterling Management Group (collectively, "Defendants"), by and through their undersigned counsel, subject to the approval of the Court, as follows:

1. The Court previously approved Stipulations by and between counsel for Plaintiffs and Defendants to respond to Plaintiffs' complaint on or before March 28, 2005.
2. Currently pending before the Court is a motion to dismiss in *Burnett v. Al Baraka Investment and Development Group, et al.* (Case No. 02-CV-1616), brought by defendants African Muslim Agency, Grove Corporate, Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Reston Investments, Safa Trust, and York Foundation (the "Moving Defendants"). That motion is fully briefed and was argued before the Court on October 12 and 14, 2004.
3. Because of the similarity of allegations against Moving Defendants and


Defendants in the above referenced actions, and in the interests of judicial economy and avoiding duplicative motions, it is hereby stipulated and agreed that Defendants shall have thirty (30) days from the date on which the Court decides Moving Defendants' motion to dismiss to answer or otherwise respond to Plaintiffs' complaint in the above-referenced cases.

4. Plaintiffs shall have sixty (60) days from the date on which it is served with Defendants' responsive pleadings to file a response, if any. Defendants shall have twenty-one (21) days thereafter to file a reply to Plaintiffs' opposition.

5. This stipulation supersedes all previous stipulations between Plaintiffs and any Defendant.

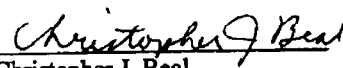
Respectfully submitted

MOTLEY RICE LLC

By:   
Jodi Westbrook Flowers  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29465

*Attorneys for Plaintiffs*

DLA PIPER RUDNICK GRAY CARY US LLP

By:   
Christopher J. Beal  
4365 Executive Drive  
Suite 1100  
San Diego, CA 92121

*Attorneys for Defendants*

SO ORDERED:

  
RICHARD CONWAY CASEY, U.S.D.J.

Dated: March 24, 2005